

**REMARKS**

The Office Action mailed July 14, 2005 has been carefully considered. Within the Office Action Claims 1-21 have been rejected. The Applicants have amended Claim 21. Reconsideration in view of the above amendments and following remarks is respectfully requested.

**Rejection under 35 U.S.C. § 102**

Claims 2, 3, 11 and 21 were rejected under 35 U.S.C. § 102(b) as being anticipated by US. Patent No. 6,252,739 to Todd et al. (hereinafter Todd). The Applicants respectfully traverse.

Todd discloses a tape driver head cleaning apparatus having a flexible body with a brush thereon, whereby the brush cleans the tape driver head when the apparatus moves the brush upward or downward when the tape cartridge is loaded and unloaded. (Todd, Col. 4, Lines 54-57). In particular, Todd expressly discloses a complete cleaning cycle as when the brush is already raised above the head 10 and is moved downward when the tape cartridge is loaded. (Todd, Col. 4, Lines 59-60). As the brush moves downward, it wipes across the head 10 until the follower 52 reaches the bottom end of the drive cam 22. (Todd, Col. 4, Lines 65-67). When the follower 52 reaches the bottom end of the drive cam 22, the cleaning apparatus has completed one full cleaning cycle. (Todd, Col. 5, Lines 7-9) (emphasis added).

Todd also discloses that the brush moves in the opposite direction in another full cleaning cycle when the tape is unloaded. (Todd, Col. 5, Lines 11-13). In particular, the counterclockwise rotation of the drive cam 22 causes the follower 52 to move up the channel 48 which in turn urges the slider 20 and the brush 24 to move upwardly. (Todd, Col. 5, Lines 13-15). When the follower 52 reaches the top end 64 of the drive cam 22, the cleaning apparatus has

again completed one cleaning cycle. (Todd, Col. 5, Lines 16-18). Therefore, Todd expressly states that the brush moves in only one direction, and not both directions, during a cleaning cycle.

Claims 2, 11 and 21 recite, among other things, that the brush sweeps along the length of the read/write head along a first direction and a second opposite direction in a cleaning cycle. (emphasis added). Under 35 USC 102, the prior art reference must recite each and every element of the claimed invention. Todd does not teach that the brush sweeps along the length of the read/wire heading in a first and a second opposite direction in a cleaning cycle. Instead, Todd discloses that the brush moves only in one direction during the cleaning cycle. In addition, considering that Todd discloses that the brush moves only in one direction during the cleaning cycle, one skilled in the art would find no motivation to modify Todd or combine Todd with another reference to reach the claimed invention(s). For at least these reasons, Todd does not teach the claimed invention(s) in Claims 2, 11 and 21. Accordingly, Claims 2, 11 and 21 are distinguishable and patentable over Todd and are therefore allowable.

Claim 3 has been rejected under 102(b) in light of Todd. However, Claim 3 is dependent on independent Claim 2. For at least the reasons stated above, Claim 2 is allowable over Todd individually or in combination with another reference. Accordingly, Claim 3 is allowable over Todd for being dependent on an allowable base claim.

#### Rejection under 35 U.S.C. § 103

Claims 4, 12, 13, 16, 18, and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Todd in view of U.S. Patent No. 6,867,947 to Davis. Claims 5, 6, 10, 14, 15 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Todd in view of U.S. Patent No. 6,697, 230 to Nayak and further in view of U. S. Patent No. 4, 139, 877 to Townsend. Also, Claims 7-9 and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Todd

in view of Nayak and further in view of U.S. Patent No.3,774,916 to Nanba. The Applicants respectfully traverse.

Claims 4-10 are dependent on independent Claim 2 and Claims 12-20 are dependent on independent Claim 11. For at least the reasons stated above, Claims 2 and 11 are allowable over Todd individually or in combination with another reference. Accordingly, Claims 4-10 and 12-20 are allowable for being dependent on allowable base claims.

### Conclusion

It is believed that the remarks place the above-identified patent application into condition for allowance. Early favorable consideration of the present application is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

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